

Roddrick B. Newhouse
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CHAPTER 7 TRUSTEE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	CHAPTER 7
	§	
TWO IS ONE, ONE IS NONE, LLC,	§	CASE NO. 24-41982-mxm7
	§	
Debtor.	§	<i>NO HEARING REQUESTED</i>
	§	

**APPLICATION FOR THE EMPLOYMENT OF McGUIRE, CRADDOCK &
STROTHER, P.C. AS ATTORNEYS FOR RODDRICK B. NEWHOUSE,
CHAPTER 7 TRUSTEE FOR THE ESTATE**

TO THE UNITED STATES BANKRUPTCY JUDGE:

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT ELDON B. MAHON FEDERAL BUILDING, 501 W. TENTH STREET, FORT WORTH, TX 76102 BEFORE CLOSE OF BUSINESS ON JULY 11, 2024, WHICH IS TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED, A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

NOW COMES **Roddrick B. Newhouse**, Chapter 7 Trustee ("Trustee") and files this Application to Employ Counsel, and would respectfully show the Court the following:

1. The Debtor case was initiated by the filing of a Voluntary Petition under Chapter 7, Title 11 of the U.S. Code on June 6, 2024. Thereafter, Roddrick B. Newhouse was appointed Chapter 7 Trustee for the Debtor's estate (the "Trustee").

2. Applicant desires to employ the undersigned attorneys as counsel for Applicant, in order to render the following services:

- (a) to render general legal advice to Applicant with respect to his duties and powers in this case;
- (b) to advise and consult generally with the Applicant regarding the assets, liabilities, and financial condition of the Estate;
- (c) to appear for, prosecute, defend, and otherwise represent the Estate's interest in suits arising in or related to this case in which Applicant is not otherwise represented;
- (d) to investigate and prosecute preference or other actions arising under the avoidance powers granted to the Applicant which may be advisable;
- (e) to assist in the preparation of such pleadings, motions, notices and orders as are required for the orderly administration of this Estate; and
- (f) to assist in liquidation of the Estate.

3. Applicant is informed that the normal hourly billing rates of said law firm at the time of this Application range from \$525.00 to \$800.00 per hour for partners and \$350.00 to \$375.00 per hour for associates. The rates for paralegals vary but are considerably less than the mentioned charges. It is contemplated that said attorneys will seek compensation based upon normal and usual hourly billing rates. Applicant believes that the proposed rates are reasonable for attorneys specialized in business bankruptcy law in this geographic area.

4. For the foregoing and all other necessary and proper purposes, the Trustee requests that the Court allow McGuire, Craddock & Strother, P.C. ("McGuire Craddock") to serve as counsel.

5. Based upon the Affidavit of Marc W. Taubenfeld attached hereto as Exhibit "A," the Trustee believes that McGuire Craddock or any of its members and associates of said counsel do not hold or represent any interest adverse to that of the estate on the matters or the matters for which employment as Counsel is sought. In addition, McGuire Craddock does not hold or represent or have any connection with the United States Trustee or any person employed in the office of the United States Trustee.

6. McGuire Craddock will file appropriate reports as required by 11 U.S.C. Sec. 329.

WHEREFORE, Roddrick B. Newhouse, Chapter 7 Trustee, respectfully requests this Court to enter an order approving the employment of McGuire, Craddock & Strother, P.C. as his Counsel for the purposes stated herein.

DATED: June 20, 2024.

Respectfully submitted,

/s/Roddrick B. Newhouse [2024-06-20]
RODDRICK B. NEWHOUSE
CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on the June 20, 2024a true and correct copy of the above and foregoing instrument was served via the Court's CM/ECF system or via United States mail, postage prepaid, upon the following:

Office of the U. S. Trustee
1100 Commerce Street, Room 976
Dallas, TX 75242
VIA CM/ECF ustpreregion06.da.ecf@usdoj.gov

Two is One, One is None, LLC
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DEBTOR

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COUNSEL FOR DALLAS COUNTY UTILITY AND RECLAMATION DISTRICT

/s/Marc W. Taubenfeld [2024-06-20]

MARC W. TAUBENFELD